

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

In re:	JOINTLY ADMINISTERED UNDER BKY 17-42726
WYNIT Distribution, LLC,	BKY 17-42726
WD Navarre Distribution, LLC,	BKY 17-42728
WD Encore Software, LLC,	BKY 17-42729
WD Navarre Holdings, LLC,	BKY 17-32864
WD Navarre Digital Services, LLC,	BKY 17-32865
WYNIT Holdings, Inc.,	BKY 17-32866
WD Navarre Canada, ULC,	BKY 17-32867
Debtors.	

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that on September 28, 2017, Tangram Factory America, Inc. (“Tangram”) delivered a letter to the above-captioned debtors asserting reclamation demands pursuant to section 2-702 of the Uniform Commercial Code and section 546 of the Bankruptcy Code (the “Reclamation Demand Letter”).

PLEASE TAKE FURTHER NOTICE that a copy of the Reclamation Demand Letter is attached to this notice and is incorporated by reference.¹

PLEASE TAKE FURTHER NOTICE that Tangram reserves all rights and other remedies that may be available, including Tangram’s right to submit an administrative expense, including under section 503(b)(9) of the Bankruptcy Code, and/or institute an adversary proceeding against the Debtors to protect its interest.

¹ The attached Reclamation Demand Letter references enclosed invoices and purchase orders. Those invoices and purchase orders were sent to the Debtors, but are not being included with this notice in order to protect Tangram’s proprietary information.

Dated: September 28, 2017

/e/ Steven R. Kinsella

Ryan T. Murphy (#0311972)

Steven R. Kinsella (#0392289)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

Telephone: 612.492.7000

rmurphy@fredlaw.com

skinsella@fredlaw.com

**ATTORNEYS FOR TANGRAM FACTORY
AMERICA, INC.**

62374476.1



September 28, 2017

VIA U.S. MAIL, FAX, AND E-MAIL

Robert T. Kugler
Edwin H. Caldie
Philip J. Ashfield
Andrew J. Glasnovich
Stinson Leonard Street
150 S. Fifth Street, Suite 2300
Minneapolis, MN 55402
Fax: 612.335.1657
robert.kugler@stinson.com
ed.caldie@stinson.com
phillip.ashfield@stinson.com
drew.glasnovich@stinson.com

Re: ***WYNIT Distribution, LLC (Case No. 17-42726)***
WD Navarre Distribution, LLC (Case No. 17-42728)
WD Encore Software, LLC (Case No. 17-42729)
WD Navarre Holdings, LLC (Case No. 17-32864)
WD Navarre Digital Services, LLC (Case No. 17-32865)
WYNIT Holdings, Inc. (Case No. 17-32866)
WD Navarre Canada, ULC (Case No. 17-32867)

Dear Counsel:

We represent Tangram Factory America, Inc. ("Tangram"). In order to preserve Tangram's rights pursuant to section 2-702 of the Uniform Commercial Code and section 546 of the Bankruptcy Code, Tangram hereby demands the reclamation and return of all products sold and delivered to the above-captioned debtors (the "Debtors") within 45 days prior to the commencement of the above-captioned bankruptcy cases. Within this 45-day period, Tangram sold and delivered to the Debtors products in the undisputed amount of at least \$39,624.00, pursuant to purchase order numbers 3227731, 3230067, 3230270, 3220491, 3220706, and invoice numbers TGH09980801 and TGH09980701. Copies of the purchase orders and invoices are enclosed with this letter. Tangram further demands that all products listed in the invoices and/or received by the Debtors from Tangram during the 45-day period be immediately

Attorneys & Advisors
main 612.492.7000
fax 612.492.7077
www.fredlaw.com

Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, Minnesota
55402-1425

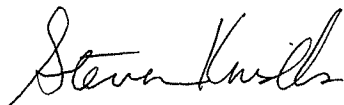
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segregated from other property in the Debtors' possession and not be sold or disposed. Tangram also demands an accounting of all items subject to this reclamation demand that are presently in the Debtors' possession.

Please be advised that Tangram makes this reclamation demand without prejudice to any and all other remedies which may be available, including Tangram's right to submit an administrative expense, including under section 503(b)(9) of the Bankruptcy Code, and/or institute an adversary proceeding against the Debtors to protect its interest. Tangram also reserves the right to identify additional products and to provide additional invoices and other supporting documents upon request. This letter shall not be construed to create any obligations of Tangram to vendors with respect to the relevant products or associated reclamation rights.

Finally, Tangram requests that all further communications regarding this matter be forwarded to our office as counsel for Tangram.

Sincerely,



Steven R. Kinsella

Direct Dial: 612.492.7244

Email: skinsella@fredlaw.com

Enclosure

62374092.1